

## **EXHIBIT A**

**STUDIO 1 DIV. of SHAZDEH FASHIONS**  
**1450 Broadway Floor 17 New York NY 10018**

**DEMAND FOR RECLAMATION**

October 24, 2018

**VIA FEDERAL EXPRESS**

Sears Holding Corporation  
3333 Beverly Road  
Hoffman Estates, IL 60179  
Attn: Robert A. Riecker, CFO

**VIA FEDERAL EXPRESS**

Jacqueline Marcus, Esq.  
Weil Gotshal & Manges, LLP  
767 5th Avenue  
New York, NY 10153

***Re: Studio 1 Div. of Shazdeh Fashions ("ST1") with  
Sears, Roebuck and Co.(18-23537)***

Dear Sir/Madam:

Goods have been shipped to Sears Holding Corporation and/or one or more of your affiliates (collectively, the "Debtors"), including, but not limited to, Sears, Roebuck and Co. and/or Kmart Holding Corporation within 45 days before the date of the Chapter 11 filings on October 15, 2018 (the "Filing Date"), represented by the attached schedule.

Pursuant to Section 546(c)(1) of the Bankruptcy Code and Section 2-702 of the Uniform Commercial Code (as applicable and adopted in the State of New York, *N.Y.U.C.C. Law*, §2-702), ST1 hereby exercises all of its rights and remedies thereunder and demands reclamation of all product ("Product"), which is listed on the attached invoices as Exhibit "A" and detailed on Exhibit "B", also attached hereto. Pursuant to Section 546(c)(1) and 2-702(2) of New York's Uniform Commercial Code, and by virtue of the Debtor's insolvency, this letter shall serve as a formal reclamation demand for the Product received by the Debtors from ST1 as set forth on the attached, except to the extent ZG has authorized the Debtors in writing post-petition to utilize specifically identifiable goods, subject to payment of same whether through an allowed claim under § 503(b)(9) of the Bankruptcy Code or otherwise.

The Product subject to this Demand for Reclamation is to be segregated and marked as property of ST1 and is not to be used or sold by the Debtors. ST1 demands immediate access as

necessary in order to identify the Product subject to this Demand for Reclamation. Please contact the undersigned upon receipt of this Demand for Reclamation in order to arrange for the prompt return of the Product subject to this Demand for Reclamation. In the alternative, please arrange for the return of the Product within seven (7) days of the date of this Demand for Reclamation.

This Demand for Reclamation shall not constitute an election of remedies by ST1 nor a waiver of any rights, remedies or claims that ST1 holds under the applicable law (including, but not limited to, the United States Bankruptcy Code), orders of court or agreements with any party, all of which are expressly reserved by ST1.

This reclamation demand is made without prejudice to any other rights or remedies available to ST1, at law or in equity, including, but not limited to, ST1's right to an administrative expense claim under section 503(b)(9) of the Bankruptcy Code for all goods received by the Debtors within 20 days before the Petition Date.

I trust I will hear from you accordingly to discuss the details without having to resort to additional litigation. If I do not hear from you, I will have no alternative but to proceed to protect ST1's rights.

For Studio 1 Div. of Shazdeh Fashions

A handwritten signature in black ink, appearing to read 'R Silverstein', written over a horizontal line.

Richard Silverstein (COO)

**Invoice**

**STUDIO I DIV OF SHAZDEH FASHIONS**

1450 BROADWAY FL 17  
NEW YORK, NY 10018 2217 USA  
Tel : 212-944-2510 Fax:

Date : **08/31/18**

Invoice # **367441**

Ship To, Store: **8780**

**KMART RSC #8780**

WESTERN REGIONAL SPECIALTY DC  
3100 MILLIKIN AVENUE  
MIRA LOMA, CA 91752 USA

FOB :

Order #.	08780033886	Ctrl #	29448
Dept #	007	Pick #	35805
Vendor #	01000134171	Slpn	GP1
Terms	4% 30DAYS ROG	Via	GILBERT EXPRESS
Factor Appr	MR.ZAR	Ctns	273
Duns #	056831209	Weight	1882
PRO #		B/L No.	10108297

Bill To, Act #: **SE300**

**SEARS, ROEBUCK AND CO.**

P.O.BOX 660200  
NATIONAL A/P CTR. TIPS PROCESS  
DALLAS, TX 75266 USA

REMIT TO: SHAZDEH FASHIONS INC  
1450 Broadway 17fl  
New York, NY 10018

STYLE	COLOR	CUST STYLE	LN	DESCRIPTION	QTY	EA	EXTENSION
71683K	GMU GMU	008822 341	1	1 PC 3/4 SLV DRESS	1,648	18.00	29,664.00
2	4 6	8 10	12 14	16 18			
	206	206	412	412 206	206		
71989K	BAQ BAQ	008822 822	2	1PC 3/4 SLV DRESS	536	18.00	9,648.00
XSM	SML MED	LRG XLG	XXL				
	67 134	201 134					

QTY :	2,184	GROSS:	39,312.00	SHIPPING	0.00	HANDLING	0.00	TOTAL:	39,312.00
2839									

NO RETURNS WILL BE ACCEPTED WITHOUT OUR AUTHORIZED RMA # AFFIXED TO PACKAGE Continuing guaranty under the Flammable Fabric Act and the Textile Products Identification Act Filed with Federal Trade Commission

**Invoice**

**STUDIO I DIV OF SHAZDEH FASHIONS**

1450 BROADWAY FL 17  
NEW YORK, NY 10018 2217 USA  
Tel : 212-944-2510 Fax:

Date : **08/31/18**

Invoice # **367442**

Ship To, Store: **8781**  
**KMART RSC #8781**  
NORTHEAST REGIONAL SPICALTY DC  
1475 NITTERHOUSE ROAD  
CHAMBERSBURG, PA 17201 USA

FOB :

Order #:	08781007829	Ctrl #	29451
Dept #	007	Pick #	35806
Vendor #	01000134171	Slpn	GP1
Terms	4% 30DAYS ROG	Via	GILBERT EXPRESS
Factor Appr	MR.ZAR	Ctns	278
Duns #	056831209	Weight	1927.04
PRO #		B/L No.	10109017

Bill To, Act #: **SE300**  
**SEARS, ROEBUCK AND CO.**  
P.O.BOX 660200  
NATIONAL A/P CTR. TIPS PROCESS  
DALLAS, TX 75266 USA

REMIT TO: SHAZDEH FASHIONS INC  
1450 Broadway 17fl  
New York, NY 10018

STYLE	COLOR		CUST STYLE		LN	DESCRIPTION	QTY	EA	EXTENSION
71683K	GMU GMU		008822	341	1	1 PC 3/4 SLV DRESS	1,616	18.00	29,088.00
2	4	6	8	10	12	14	16	18	
		202	202	404	404	202	202		
71989K	BAQ BAQ		008822	822	2	1PC 3/4 SLV DRESS	608	18.00	10,944.00
XSM	SML	MED	LRG	XLG	XXL				
	76	152	228	152					

QTY :	2,224	GROSS:	40,032.00	SHIPPING	0.00	HANDLING	0.00	TOTAL:	40,032.00
2840									

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Flammable Fabric Act and the Textile Products Identification Act Filed with Federal Trade Commission

Invoice

**STUDIO I DIV OF SHAZDEH FASHIONS**

1450 BROADWAY FL 17  
NEW YORK, NY 10018 2217 USA  
Tel : 212-944-2510 Fax:

Date : **09/12/18**

Invoice # **368397**

Ship To, Store: **8780**

**KMART RSC #8780**

WESTERN REGIONAL SPECIALTY DC  
3100 MILLIKIN AVENUE  
MIRA LOMA, CA 91752 USA

FOB :

Order #:	08780035075	Ctrl #	30046
Dept #	007	Pick #	36124
Vendor #	01000134171	Slpn	GP1
Terms	4% 30DAYS ROG	Via	GILBERT EXPRESS
Factor Appr	MR.ZAR	Ctns	389
Duns #	056831209	Weight	3112
PRO #		B/L No.	10110193

Bill To, Act #: **SE300**

**SEARS, ROEBUCK AND CO.**

P.O.BOX 660200  
NATIONAL A/P CTR. TIPS PROCESS  
DALLAS, TX 75266 USA

REMIT TO: SHAZDEH FASHIONS INC  
1450 Broadway 17fl  
New York, NY 10018

STYLE	COLOR			CUST STYLE		LN	DESCRIPTION	QTY	EA	EXTENSION
71890K	BIU	BIVP		008822	398	1	1 PC 3/4 SLV DRESS	1,504	18.00	27,072.00
2	4	6	8	10			12	14	16	18
		188	188	376			376	188	188	
72069K	WIM	WIM		008812	794	2	1PC 3/4 SLV DRESS	1,608	18.00	28,944.00
2	4	6	8	10			12	14	16	18
		201	201	402			402	201	201	

QTY : 3,112 GROSS: 56,016.00 SHIPPING 0.00 HANDLING 0.00 TOTAL: 56,016.00  
2955

NO RETURNS WILL BE ACCEPTED WITHOUT OUR AUTHORIZED RMA # AFFIXED TO PACKAGE Continuing guaranty under the  
Flammable Fabric Act and the Textile Products Identification Act Filed with Federal Trade Commission

Page 1 of 1

Invoice

**STUDIO I DIV OF SHAZDEH FASHIONS**

1450 BROADWAY FL 17  
NEW YORK, NY 10018 2217 USA  
Tel : 212-944-2510 Fax:

Date : **09/12/18**

Invoice # **368398**

Ship To, Store: **8781**  
**KMART RSC #8781**  
NORTHEAST REGIONAL SPECIALTY DC  
1475 NITTERHOUSE ROAD  
CHAMBERSBURG, PA 17201 USA

FOB :

Order #:	08781009040	Ctrl #	30047
Dept #	007	Pick #	36125
Vendor #	01000134171	Slpn	GP1
Terms	4% 30DAYS ROG	Via	GILBERT EXPRESS
Factor Appr	MR.ZAR	Ctns	403
Duns #	056831209	Weight	3224
PRO #		B/L No.	10110195

Bill To, Act #: **SE300**  
**SEARS, ROEBUCK AND CO.**  
P.O.BOX 660200  
NATIONAL A/P CTR. TIPS PROCESS  
DALLAS, TX 75266 USA

REMIT TO: SHAZDEH FASHIONS INC  
1450 Broadway 17fl  
New York, NY 10018

STYLE	COLOR		CUST STYLE		LN	DESCRIPTION		QTY	EA	EXTENSION
71890K	BIU	BIVP	008822	398	1	1 PC 3/4 SLV DRESS		1,568	18.00	28,224.00
2	4	6	8	10	12		14	16	18	
		196	196	392	392		196	196		
72069K	WIM	WIM	008812	794	2	1PC 3/4 SLV DRESS		1,656	18.00	29,808.00
2	4	6	8	10	12		14	16	18	
		207	207	414	414		207	207		

QTY :	3,224	GROSS:	58,032.00	SHIPPING	0.00	HANDLING	0.00	TOTAL:	58,032.00
2956									

NO RETURNS WILL BE ACCEPTED WITHOUT OUR AUTHORIZED RMA # AFFIXED TO PACKAGE Continuing guaranty under the  
Flammable Fabric Act and the Textile Products Identification Act Filed with Federal Trade Commission

**Invoice**

**STUDIO I DIV OF SHAZDEH FASHIONS**

1450 BROADWAY FL 17  
NEW YORK, NY 10018 2217 USA  
Tel : 212-944-2510 Fax:

Date : **09/30/18**

Invoice # **369012**

Ship To, Store: **8780**  
**KMART RSC #8780**  
WESTERN REGIONAL SPECIALTY DC  
3100 MILLIKIN AVENUE  
MIRA LOMA, CA 91752 USA

FOB :

Order #:	08780037051	Ctrl #	31874
Dept #	007	Pick #	37781
Vendor #	01000134171	Slpn	GP1
Terms	4% 30DAYS ROG	Via	GILBERT EXPRESS
Factor Appr	MR. ZAR	Ctns	1165
Duns #	056831209	Weight	3250.56
PRO #		B/L No.	10115799

Bill To, Act #: **SE300**  
**SEARS, ROEBUCK AND CO.**  
P.O.BOX 660200  
NATIONAL A/P CTR. TIPS PROCESS  
DALLAS, TX 75266 USA

REMIT TO: SHAZDEH FASHIONS INC  
1450 Broadway 17fl  
New York, NY 10018

STYLE	COLOR	CUST STYLE	LN	DESCRIPTION	QTY	EA	EXTENSION
71934K	BLI BLIV	009936 674	1	1 PC 3/4 SLV DRESS	960	18.00	17,280.00
2	4 6 8 10 12 14 16 18	120 120 240 240 120					
96100K	BKI BKIV	009934 057	2	1PC 3/4 SLV DRESS	640	17.50	11,200.00
XSM	SML MED LRG XLG XXL	80 160 240 160					
96215K	IVY IVY	009930 645	3	1 PC L/S DRESS	536	17.50	9,380.00
XSM	SML MED LRG XLG XXL	67 134 201 134					
96215K	RG3 RUBY	009930 681	4	1 PC L/S DRESS	1,344	17.50	23,520.00
XSM	SML MED LRG XLG XXL	168 336 504 336					
96224K	RED RED	009934 170	5	1 PC 3/4 SLV DRESS	424	17.50	7,420.00
XSM	SML MED LRG XLG XXL	53 106 159 106					
96228K	BIV BIV	009930 758	6	1 PC L/S DRESS	1,344	17.50	23,520.00
XSM	SML MED LRG XLG XXL	168 336 504 336					
96228K	HUB HUB	009930 895	7	1 PC L/S DRESS	536	17.50	9,380.00
XSM	SML MED LRG XLG XXL	67 134 201 134					
96239K	BD2 BIVW	009930 719	8	1 PC 3/4 SLV DRESS	424	17.00	7,208.00
XSM	SML MED LRG XLG XXL	53 106 159 106					
96269K	BY2 BS	009934 086	9	1 PC	424	17.50	7,420.00
XSM	SML MED LRG XLG XXL	53 106 159 106					

*Continued*

NO RETURNS WILL BE ACCEPTED WITHOUT OUR AUTHORIZED RMA # AFFIXED TO PACKAGE Continuing guaranty under the Flammable Fabric Act and the Textile Products Identification Act Filed with Federal Trade Commission



**Invoice**

**STUDIO I DIV OF SHAZDEH FASHIONS**

1450 BROADWAY FL 17  
NEW YORK, NY 10018 2217 USA  
Tel : 212-944-2510 Fax:

Date : **09/30/18**

Invoice # **369012**

Ship To, Store: **8780**  
**KMART RSC #8780**  
WESTERN REGIONAL SPECIALTY DC  
3100 MILLIKIN AVENUE  
MIRA LOMA, CA 91752 USA

Bill To, Act #: **SE300**  
**SEARS, ROEBUCK AND CO.**  
P.O.BOX 660200  
NATIONAL A/P CTR. TIPS PROCESS  
DALLAS, TX 75266 USA

Order #:	08780037051	Ctrl #	31874
Dept #	007	Pick #	37781
Vendor #	01000134171	Slpn	GP1
Terms	4% 30DAYS ROG	Via	GILBERT EXPRESS
Factor Appr	MR. ZAR	Ctns	1165
Duns #		Weight	3250.56
PRO #		B/L No.	10115799

REMIT TO: SHAZDEH FASHIONS INC  
1450 Broadway 17fl  
New York, NY 10018

STYLE	COLOR	CUST STYLE	LN	DESCRIPTION	QTY	EA	EXTENSION
96305K	BIW BIWE	009929 550	10	1PC 3/4 SLV DRESS	1,344	15.50	20,832.00
XSM	SML	MED	LRG	XLG	XXL		
	168	336	504	336			
96306K	IBD IBBX	009939 247	11	1PC 3/4 SLV DRESS	1,344	15.00	20,160.00
XSM	SML	MED	LRG	XLG	XXL		
	168	336	504	336			

QTY :	9,320	GROSS:	157,320.00	SHIPPING	0.00	HANDLING	0.00	TOTAL:	157,320.00
3082									

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Flammable Fabric Act and the Textile Products Identification Act Filed with Federal Trade Commission

**Invoice**

**STUDIO I DIV OF SHAZDEH FASHIONS**

1450 BROADWAY FL 17  
NEW YORK, NY 10018 2217 USA  
Tel : 212-944-2510 Fax:

Date : **09/30/18**

Invoice # **369067**

Ship To, Store: **8781**  
**KMART RSC #8781**  
NORTHEAST REGIONAL SPECIALTY DC  
1475 NITTERHOUSE ROAD  
CHAMBERSBURG, PA 17201 USA

FOB :

Order #:	08781011062	Ctrl #	31875
Dept #	007	Pick #	37783
Vendor #	01000134171	Slpn	GP1
Terms	4% 30DAYS ROG	Via	GILBERT EXPRESS
Factor Appr	MR.ZAR	Ctns	944
Duns #	056831209	Weight	2641.44
PRO #		B/L No.	10116815

Bill To, Act #: **SE300**  
**SEARS, ROEBUCK AND CO.**  
P.O.BOX 660200  
NATIONAL A/P CTR. TIPS PROCESS  
DALLAS, TX 75266 USA

REMIT TO: SHAZDEH FASHIONS INC  
1450 Broadway 17fl  
New York, NY 10018

STYLE	COLOR	CUST STYLE	LN	DESCRIPTION	QTY	EA	EXTENSION
71934K	BLI BLIV	009936 674	1	1 PC 3/4 SLV DRESS	824	18.00	14,832.00
2	4 6	8 10	12 14	16 18			
	103	103	206	206 103			
96100K	BKI BKIV	009934 057	2	1PC 3/4 SLV DRESS	560	17.50	9,800.00
XSM	SML MED	LRG XLG	XXL				
	70 140	210 140					
96215K	IVY IVY	009930 645	3	1 PC L/S DRESS	368	17.50	6,440.00
XSM	SML MED	LRG XLG	XXL				
	46 92	138 92					
96215K	RG3 RUBY	009930 681	4	1 PC L/S DRESS	1,056	17.50	18,480.00
XSM	SML MED	LRG XLG	XXL				
	132 264	396 264					
96224K	RED RED	009934 170	5	1 PC 3/4 SLV DRESS	368	17.50	6,440.00
XSM	SML MED	LRG XLG	XXL				
	46 92	138 92					
96228K	BIV BIV	009930 758	6	1 PC L/S DRESS	1,056	17.50	18,480.00
XSM	SML MED	LRG XLG	XXL				
	132 264	396 264					
96228K	HUB HUB	009930 895	7	1 PC L/S DRESS	464	17.50	8,120.00
XSM	SML MED	LRG XLG	XXL				
	58 116	174 116					
96239K	BD2 BIVW	009930 719	8	1 PC 3/4 SLV DRESS	376	17.00	6,392.00
XSM	SML MED	LRG XLG	XXL				
	47 94	141 94					
96269K	BY2 BS	009934 086	9	1 PC	368	17.50	6,440.00
XSM	SML MED	LRG XLG	XXL				
	46 92	138 92					

*Continued*

NO RETURNS WILL BE ACCEPTED WITHOUT OUR AUTHORIZED RMA # AFFIXED TO PACKAGE Continuing guaranty under the  
Flammable Fabric Act and the Textile Products Identification Act Filed with Federal Trade Commission

**Invoice**

**STUDIO I DIV OF SHAZDEH FASHIONS**

1450 BROADWAY FL 17  
NEW YORK, NY 10018 2217 USA  
Tel : 212-944-2510 Fax:

Date : **09/30/18**

Invoice # **369067**

Ship To, Store: **8781**  
**KMART RSC #8781**  
NORTHEAST REGIONAL SPICALTY DC  
1475 NITTERHOUSE ROAD  
CHAMBERSBURG, PA 17201 USA

Bill To, Act #: **SE300**  
**SEARS, ROEBUCK AND CO.**  
P.O.BOX 660200  
NATIONAL A/P CTR. TIPS PROCESS  
DALLAS, TX 75266 USA

Order #	08781011062	Ctrl #	31875
Dept #	007	Pick #	37783
Vendor #	01000134171	Slpn	GP1
Terms	4% 30DAYS ROG	Via	GILBERT EXPRESS
Factor Appr	MR.ZAR	Ctns	944
Duns #		Weight	2641.44
PRO #		B/L No.	10116815

REMIT TO: SHAZDEH FASHIONS INC  
1450 Broadway 17fl  
New York, NY 10018

STYLE	COLOR	CUST STYLE	LN	DESCRIPTION	QTY	EA	EXTENSION
96305K	BIW BIWE	009929 550	10	1PC 3/4 SLV DRESS	1,056	15.50	16,368.00
XSM	SML	MED	LRG	XLG	XXL		
	132	264	396	264			
96306K	IBD IBBX	009939 247	11	1PC 3/4 SLV DRESS	1,056	15.00	15,840.00
XSM	SML	MED	LRG	XLG	XXL		
	132	264	396	264			

QTY :	7,552	GROSS:	127,632.00	SHIPPING	0.00	HANDLING	0.00	TOTAL:	127,632.00
3098									

NO RETURNS WILL BE ACCEPTED WITHOUT OUR AUTHORIZED RMA # AFFIXED TO PACKAGE Continuing guaranty under the  
Flammable Fabric Act and the Textile Products Identification Act Filed with Federal Trade Commission

**Studio - Sears**

**Open invoice's as of October 22, 2018**

**Terms: 4% 30 Days ROG**

State	Invoice	Inv. Date	Po #	Amount	Paid	Balance	Due Date	Rec'd
CA	367441	8/31/2018	8780033886	\$39,312.00	\$0.00	\$39,312.00	10/12/2018	9/17/2018
PA	367442	8/31/2018	8781007829	\$40,032.00	\$0.00	\$40,032.00	10/10/2018	9/11/2018
CA	368397	9/12/2018	8780035075	\$56,016.00	\$0.00	\$56,016.00	10/22/2018	9/27/2018
PA	368398	9/12/2018	8781009040	\$58,032.00	\$0.00	\$58,032.00	10/18/2018	9/18/2018
CA	369012	9/30/2018	8780037051	\$157,320.00	\$0.00	\$157,320.00		
PA	369067	9/30/2018	8781011062	\$127,632.00	\$0.00	\$127,632.00		
				<b>\$478,344.00</b>	<b>\$0.00</b>	<b>\$478,344.00</b>		